

REMARKS

This is in response to the Office Action mailed on February 26, 2004, and the references cited therewith.

Claims 1, 7, 14, and 19-20 are amended; as a result, claims 1-20 are now pending in this application.

Specification Objections

The Examiner has objected to the specification on the grounds that it lacks the antecedent basis to support the use of the terms "tag" and "text description" included in claims 19 and 20. Applicant disagrees with this assessment, since the original claim language can be an independent source of support and since the original claim language is in fact part of the original filed specification. Moreover, this interpretation of initial claim language being an independent source of support for the specification is a matter that is and has been well-settled in the law.

However, in order to expedite the present invention and more clearly point out that which the Applicant believes to be his invention, the Applicant has amended claims 19 and 20 and has removed references to these terms. Support for the newly added term "counter" can be found, by way of example only, on page 13 in the paragraph that begins with the discussion of FIG. 9. Accordingly, these objections are no longer appropriate.

Claim Objections

Claim 14 and 20 were objected to due to typographical errors. These errors have been corrected as suggested by the Examiner. Accordingly, these objections are no longer appropriate.

§102 Rejection of the Claims

Claims 1-4 and 6-13 were rejected under 35 USC § 102(b) as being anticipated by Ferrel et al., (U.S. Patent No. 5,860,073.). It is fundamental that in order to sustain an anticipation rejection that each and every step or element in the rejected claims must be taught or disclosed in the cited reference.

Ferrel is directed to modifying a style sheet for purposes altering the layout and appearance of data displayed on a page. That is, Ferrel teaches altering a layout definition and to achieve this, Ferrel represents and manipulates the layout definition in specific manual manners using automated tools (project editor). However, Ferrel does not teach or suggest how data is translated from an input data format to an output data format, such that the same initial layout for that data is substantially maintained.

That is, Ferrel modifies a provided layout, but Ferrel does not accept one input data format and then output it according to a defined and desired output data format using the same initially provided layout. Ferrel requires numerous manual interactions with a project editing tool to move a specific layout to a modified version of the same layout. Ferrel does not permit or teach an automatic technique for automatically translating or rendering data from an input format to an output format using the same layout. In other words, and as an example for purposes of illustration, Ferrel can not automatically render data from HTML to PDF; rather, Ferrel would alter how HTML is rendered to an output layout via its XSL definition and Ferrel would not address rendering HTML to PDF using an unmodified XSL definition provided with the HTML. Ferrel alters the layout by providing tools for manually modifying an existing layout definition. The modified layout is not automatically generated it is manually created through interactions with the project editor. Moreover, the data itself is not translated from an input format to an output format, since only the layout is altered in Ferrel.

Accordingly, Ferrel does not teach each and every aspect of Applicant's amended independent claims 1 and 7. Thus, the rejections with respect to claims 1-4 and 6-13 should be withdrawn because claims 1 and 7 are allowable over Ferrel and claims 3-4, 6, and 8-13 are dependent claims of independent claims 1 and 7.

§103 Rejection of the Claims

Claims 5 and 14-18 were rejected under 35 USC § 103(a) as being unpatentable over Ferrel et al., (U.S. Patent No. 5,860,073). To sustain obviousness rejections each and every element or step in the rejected claims must be taught or suggested in the reference cited or combination of references cited.

With respect to claim 5, Applicant notes that as stated above with respect to claim 1, Ferrel lacks any teaching or suggestion of a teaching that automatically renders data from an input data format to an output data format. Accordingly, since claim 5 is dependent from amendment independent claim 1, the rejection of this claim should be withdrawn.

With respect to amended independent claim 14, Ferrel teaches techniques and tools for manually altering a layout for data being rendered. In Ferrel, there is no teaching or even a suggestion of a teaching of how data is automatically translated from an input format to an output format, where the initial layout for the data being rendered is substantially maintained. The input and output formats are now positively recited as limitations in Applicant's amended independent claim 14. Therefore, the rejections with respect to claims 14-18 should be withdrawn.

Claims 19 and 20 were rejected under 35 USC § 103(a) as being unpatentable over Ferrel et al., (U.S. Patent No. 5,860,073) in view of Cuan et al. (U.S. Patent No. 4,503,515). Claims 19 and 20 are dependent from amended independent claim 14, thus for the reasons stated above with respect to amended independent claim 14, the rejections with respect to claims 19 and 20 should be withdrawn.

Conclusion

Applicant respectfully submits that the claims are in condition for allowance, and notification to that effect is earnestly requested. The Examiner is invited to telephone Applicant's attorney at (513) 942-0224 to facilitate prosecution of this application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 19-0743.

Respectfully submitted,

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CERTIFICATE UNDER 37 CFR 1.8: The undersigned hereby certifies that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail, in an envelope addressed to: Commissioner of Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on this 26th day of May, 2004.

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